

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

| | | |
|--------------------------|---|--------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CRIMINAL NO. 3:12-CR-137 |
| |) | |
| KOLON INDUSTRIES, INC., |) | |
| JONG-HYUN CHOI, |) | |
| IN-SIK HAN |) | |
| JU-WAN KIM, |) | |
| KYEONG-HWAN RHO |) | |
| YOUNG-SOO SEO |) | |
| |) | |
| Defendants. |) | |

**MOTION FOR LEAVE TO ENTER LIMITED AND SPECIAL APPEARANCES ON
BEHALF OF KOLON INDUSTRIES, INC.**

PLEASE TAKE NOTICE that counsel for Kolon Industries, Inc. (“Kolon”) hereby move the Court for an order granting leave to appear specially for the limited purpose of moving to contest the purported service of the summons of the Indictment on Kolon and to dismiss the Indictment for lack of personal jurisdiction over Kolon (the “Motion”).

This Motion is made on the grounds that the Court has authority to and should grant Kolon’s counsel’s request for leave to appear specially to file a motion contesting service of the summons on Kolon, without waiving Kolon’s objections to the service of summons or personal jurisdiction over Kolon. If the Motion is granted, Kolon’s counsel will, within three days, file a motion appearing specially to quash the service of the summons on Kolon and to dismiss the Indictment for lack of personal jurisdiction.

A memorandum in support of the Motion is filed herewith.

Respectfully submitted

By: _____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of December, 2012, I electronically filed the foregoing **MOTION FOR LEAVE TO ENTER LIMITED AND SPECIAL APPEARANCES ON BEHALF OF KOLON INDUSTRIES, INC.** with the clerk using CM/ECF system and, which will then send a notification of such filing (NEF) to counsel named below:

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